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Attorneys for Plaintiff,

THE TRAVELERS INDEMNITY COMPANY OF CONNECTICUT

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA – EASTERN DIVISION

THE TRAVELERS INDEMNITY
COMPANY OF CONNECTICUT, a
Connecticut Corporation,

Plaintiff,

vs.

MUHLHAUSER STEEL, INC., a
California Corporation; ANGELES
CONTRACTOR, INC., a California
Corporation, and DOES 1 through 10
inclusive,

Defendants.

CASE NO.: 8:24-cv-01913-CV-ADS

**DECLARATION OF LINDSEE B.
FALCONE**

Date: February 27, 2025

Time: 10:00 a.m.

Place: 6D, 6th Floor

DECLARATION OF LINDSEE B. FALCONE

I, Lindsee B. Falcone, declare as follows:

1. I am an attorney, licensed to practice before the courts of the State of California. I am a partner with the law firm The Aguilera Law Group, APLC, which is counsel of record for plaintiff The Travelers Indemnity Company of Connecticut (“Travelers”) in this matter. I have personal knowledge of the matters stated in this declaration and could competently testify to them if called as a witness.

2. On February 6, 2025, I reviewed the online docket for *Angeles Contractor, Inc. v. Muhlhauser Steel, Inc., et al.*, Orange County Superior Court, Case No. 30-2021-01211990 (the “Underlying Action”) on the Orange County Superior Court’s website. The only upcoming hearing is a status conference in April. No trial date is listed as having been set.

I declare under penalty of perjury under the laws of California and the United States of America that the foregoing is true and correct and this declaration was executed this 6th day of February, 2025, at Crystal Beach, Florida.

By: /s/ Lindsee B. Falcone
Lindsee B. Falcone